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February 25, 2021

VIA ECF

The Honorable Zahid N. Quraishi
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: *UMG Records, Inc., et al. vs. RCN Telecom Services, LLC, et al.*
Civil Action No. 19-17272-MAS-ZNQ

Dear Judge Quraishi:

This firm represents Defendants in the above-referenced matter. We write jointly on behalf of Defendants, Plaintiffs, and Counterclaim Defendants RIAA and Rightscorp to request a sixty (60) day extension of the following two deadlines: (1) deadline for the submission of written discovery disputes; and (2) deadline for the close of fact discovery.

The Scheduling Order currently sets a deadline of February 26, 2021 for all written discovery disputes to be submitted to the Court. ECF No. 114 at 2. The scheduling order also sets a deadline for all fact discovery to be completed by May 31, 2021. *Id.*

The parties are diligently and in good faith continuing to participate in and work toward completing discovery, but the parties agree that additional time is necessary. For this reason, the parties respectfully request that the above deadlines be extended by sixty (60) days as follows: (1) deadline for the submission of written discovery disputes be extended from February 26, 2021, to April 27, 2021; and (2) deadline for the completion of all fact discovery be extended from May 31, 2021, to July 30, 2021.

We have included a “So Ordered” provision at the end of this letter in the hope that this extension is acceptable to the Court.

Respectfully Submitted,

/s/ *Edward Behm*

Edward F. Behm, Jr.

EFB:gc

CC: All counsel of record via ECF

The above Application is SO ORDERED this ____ day of February, 2021.

The Honorable Zahid N. Quraishi